

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LEONARD C. JEFFERSON,
Plaintiff,

FILED

v.

C.A. NO. 04-44 ERIE

WILLIAM WOLFE, et al.,
Defendants.

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CLERK
U.S. DISTRICT COURT
PLAINTIFF'S SECOND REQUEST FOR JUDICIAL NOTICE

NOW COMES plaintiff LEONARD C. JEFFERSON, and respectfully asks this Honorable Court to take Judicial Notice of the following, pursuant to Rule 201 of the Fed.R.Civ.P.:

1. William Penn received a Charter from the King of England in 1681 C.E. to establish Pennsylvania.
2. William Penn was a member of The Religious Society of Friends, who were commonly known as Quakers at that time and today.
3. William Penn, and others, were banished from England as the result of their extremist religious beliefs and activities.
4. William Penn established the Commonwealth of Pennsylvania as a "Holy Experiment."
5. Pennsylvania is still known and identified today as being the Quaker State.
6. Quakers ran the government of Pennsylvania from 1682 until 1756.
7. The fundamentalist/extremist-Christian beliefs of 17th & 18th Century Quakers in Pennsylvania caused them to reject the idea of capital punishment (except in cases of murder) and corporal punishment as being unacceptable forms of punishment.
8. The Quakers who governed Pennsylvania during the 17th & 18th Centuries believed offenders could be "reformed" (i.e., made to accept Quaker religious

values, morals ethics and practices) through isolation, hard work and silent meditation.

9. Silent meditation is the form of prayer adopted and used by The Society of Friends from its 17th Century origin to this present day.

10. A "project" of the Quakers' "Holy Experiments" in Pennsylvania produced and established the new features at Philadelphia's Walnut Street Jail in 1790, which included a classification system and a separate cell house for convicted prisoners, that authorities view as being the first penitentiary in the United States.

11. The first system developed and established in Pennsylvania by Quakers for the purpose of "reforming" (Quakerizing) alleged-criminals became known by authorities, then and now, as The Pennsylvania System.

12. By the mid-1820s Quakers in Albany, NY developed and established a different method for attempting to "reform" (Quakerize) their prisoners.

13. The system developed in the 1820s at Albany became known by authorities, then and now, as The Albany System.

14. As with all Quaker institutions, religious instruction formed the basis for/of all of the programs and activities for prisoners in the 17th & 18th Century Pennsylvania and Albany System prisons.

15. The Quakers placed prisoners who resisted and/or refused to become "Quakerized" in solitary confinement.

16. Quakers developed and established the Pennsylvania and Albany Systems with the specific intent of reforming prisoners by imposing Quaker religious beliefs, morals, values and practices (excluding the beliefs, morals, values and practices of all other religious and non-religious philosophies) upon their prisoners.

17. The Pennsylvania and Albany Systems developed and established by

Quakers more than 200 years ago remain in use today, in slightly modified forms.

18. The Society of Friends was founded in England at some time around 1652 by a man named George Fox.

19. George Fox based his teachings upon the belief that there is "that of God in every man" and that by following this Divine Spirit, the Inner Light, one can discover true belief and righteous conduct.

20. George Fox founded The Religious Society of Friends based upon his experiences, perceptions and personal opinions of what he believed to be morally right and wrong.

21. Prisoners were the only group of people in Pennsylvania in the 17th & 18th Centuries against whom the Quakers used the power of the Commonwealth, State institutions, physical force, deprivations and moral teachings in an attempt to force prisoners to accept, adopt and to practice the moral teachings of George Fox.

22. There is no question about the fact that the Pennsylvania and Albany Systems were developed and established by a religious group as full-blown, all up in your face, state-sponsored religious institutions.

23. Prisoners, including Plaintiff, in PA DOC custody today are the only people in the Commonwealth of Pennsylvania against whom the Commonwealth uses the overwhelming power of the State, State institutions, State and Federal tax dollars, physical force, threats and intimidation, unimaginable hi-tech electronic devices, sensory deprivations (which include celibacy, complete termination of all contact with other humans, and isolation behind walls and fences and razor wire in extremely remote locations) and moral teachings of men and women [such as Joel Barrow, Lois Brown Velkoff, Melissa Cidade, Sara Crawford, Roxanne Dinesen, Elizabeth Eppley, Greg Gaertner, Rex Hildebrand,

Barbara Hollinbaugh, Eric Johnson, John Johnson, Bob Wienckoski, Jim Rice, Dave Roberts, Geoff Lucas, Paul Thomas, Harvey Bell, Donna Giordano, Joan Mann, Rebecca Bollinger, Amy Florence and others (who founded various PA DOC prescriptive programs based upon their experiences, perceptions and personal opinions of what they believe to be morally right and wrong, in the same manner as George Fox)] in an attempt to force prisoners to accept, adopt and to practice the moral teachings of the men and women named in this paragraph.

24. There is no question about the fact that the PA DOC's prescriptive programs were developed and established (by the individuals named in ¶ 23 herein) as full-blown, all up in your face, state-sponsored religious programs.

25. The Court need not waste its precious time and resources on a trial to decide an issue which is comprised entirely of well-documented and widely-known/accepted historical facts.

WHEREFORE Plaintiff respectfully asks this Honorable Court to take Judicial Notice of the foregoing facts.

Respectfully submitted

Leonard C. Jefferson

Leonard C. Jefferson, CL-4135
10745 Rt. 18
Albion, PA 16475-0002

Dated: September 30, 2006

CERTIFICATE OF SERVICE

The undersigned here by certifies that on this the *1st* day of October, 2006 he placed a true and correct copy of the forgoing PLAINTIFF'S SECOND REQUEST FOR JUDICIAL NOTICE in the mailbox on F-Unit of SCI-Albion for delivery via First-Class Mail to the person named below:

Mary Friedline
Senior Deputy Attorney General
Office Of Attorney General
6th Floor, Manor Complex
564 Forbes Ave.
Pittsburgh, PA 15219

Leonard C. Jefferson

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